## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-CR-6309-SEITZ

NIGHT BOX FILED

**CLARENCE MADDOX** CLERK, USDC / SDFL / MIA

UNITED STATES OF AMERICA. Plaintiff,

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JOSEPH RUSSO AND DOREEN RUSSO, Defendants.

## DOREEN RUSSO'S MOTION TO EXTEND DEADLINE FOR FILING PRETRIAL MOTIONS

Defendant Doreen Russo, through counsel, moves the court to extend the time to file additional pretrial motions until December 3, 2001. On this same date, Ms. Russo is filing several motions. However, there are additional motions that we need to explore with co-counsel for her defendant husband, Joe Russo. However, co-counsel Jayne Weintraub had a family emergency and has been unavailable to address these additional issues. Accordingly, Ms. Russo request that the Court provide until December 3, 2001 to file additional pretrial motions.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

\_\_, 2001 a true and correct copy of the I HEREBY CERTIFY that on

foregoing was furnished by mail to:

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